EXHIBIT 2

Deposition of
Juan Piza-Blondet

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF PUERTO RICO

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UNITED STATES OF AMERICA :
:
Plaintiff :
:
v. :CIVIL NO. 98-1664(CCC)
:CIVIL NO. 98-2344(CCC)
33,92536 ACRES OF LAND, MORE :
OR LESS, SITUATED IN VEGA BAJA, :
COMMONWEALTH OF PUERTO RICO, :
AND JUAN PIZA BLONDET, AND :
UNKNOWN OWNERS :
:
Defendants :
:
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DEPOSITION OF:

JUAN PIZA BLONDET

was taken on April 6, 2006 at the offices of CARLOS GAZTAMBIDE & ASSOCIATES, Banco Popular Center, Suite 1515, 208 Mu¤oz Rivera Avenue, Hato Rey, Puerto Rico, commencing at 1:38 p.m.

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MR. MUNPHREY: Just ask you to qualify develop.

EXAMINATION CONTINUED

BY MR. TAPICK:
Q Okay. I'll rephrase the question.
Is there sand on the portion of your farm that you developed into the Haciendas de Tortuguero subdivision?
A There might be some.
Q And by sand, I'm referring to silica sand. Does that change your answer?
A No. There might be some.
Q Did you hire anyone to analyze the quantity of sand before you began developing the Haciendas de Tortuguero subdivision?
A At one point, yes.
Q Who did you hire?
A Santiago.
Q The Engineer Santiago who assisted you and that you referenced before?
A Uh-huh.
Q Did Mr. Santiago recommend that you extract the sand prior to the development of the Haciendas de Tortuguero?
A Well, let's put it this way. I don't think he

recommended because we knew if we had silica sand, it's a great deal to sell it, so we would be in the same idea, that it would be good to sell it. I think he worked more on the lot which is next to the tower and the lot, he did do the plans, part of the plans of the Haciendas de Tortuguero and he didn't recommend because if we had sand, it's a very good deal for us.
Q Did you extract sand before you developed Haciendas de Tortuguero on that particular site?
A Well, let's say we extracted sand from the limit of the tower to the west. That would take maybe 180 acres or something acres.
Q Is that where the Haciendas de Tortuguero Development is located?
A Yes, it's there. Part of that.
Q So your testimony is that you extracted sand from the boundary of the tower property, is that what I heard you say?
A Well, we wanted to extract sand from the tower but did not think it appropriate since it was rented to the government. If it had not been rented to the government, we would have extracted, there's a hell of a lot of sand there.
Q But you extracted sand from the edge of the

tower property all the way to the west, west meaning to the edge of your property on the west, is that --
A On the Road 687, 687.
Q How much sand did you extract from that area?
A That was years ago. The thing is the people from Owens, I talked to them because of you people and now they're going to come back to the farm because they need sand.
They said they could get the permission so I get the, the, I fill in from the mountain, I've got two, what do you call them, "canteras". "Canteras" is where you get fill, land fill from the mountain, I got on the farm or "cerro" and you put it into the, where you take the sand out so we're going to examine, the only thing they're paying much more now than they used to pay.
Q So it's your testimony that you're in the process of speaking to Owens Illinois currently about extracting sand from --
A Yes.
Q -- other parts of your farm, is that correct?
A Yes. We want to do that. It's very good deal and they've got a problem, they're going to be closed if they don't get sand.
Q Have you done the talking with Owens Illinois

or is it a representative of yours?
A No, I talked to them.
Q Can you tell me who you spoke to at Owens Illinois?
A Yes. I have it written down. I can get the papers and I can give you the exact names and telephone numbers.
Q So the 34 acre portion of your farm that the FAA acquired as part of this case is not the only part of your farm that has sand deposits, correct?
A There was sand all over the place. Well, yes.
Q In your prior sand extra operations that you undertook on your farm, can you give me a time frame when they occurred? Ballpark, if you could.
A From '88 up. Now, far up, I don't, I can't really precise it.
Q Do you recall if you were in the process of extracting sand on the rest of your farm on the date of taking, December 2nd, 1998?
A I didn't even know I had a taking so I mean, I can't precise it. I got informed later on. It was '98, not '88, yes.
Q Have you formed an opinion of value for the 34 acres of land that were acquired by the FAA in this